



October 30, 2024

Dionne Filiatrault
Executive Director
Nunavut Impact Review Board
29 Mitik Street, PO Box 1360
CAMBRIDGE BAY, NU X0B 0C0

NIRB File: 24XN038

Via Email: info@nirb.ca

RE: Notice of Screening and Comment Request for West Kitikmeot Resources Corporation's Grays Bay Road and Port Project Proposal (NIRB File No.: 24XN038)

Dionne Filiatrault,

On September 24, 2024, the Nunavut Impact Review Board (the Board) issued its Notice of Screening and Comment Request for West Kitikmeot Resources Corporation's Grays Bay Road and Port project proposal.

The Board requested that interested parties review documents related to the project proposal and provide comments on:

- Whether the project proposal is likely to arouse significant public concern; and if so, why;
- Whether the project proposal is likely to cause significant adverse eco-systemic or socio-economic effects; and if so, why;
- Whether the project proposal is likely to cause significant adverse impacts on wildlife habitat or Inuit harvest activities; and if so, why;
- Whether the project proposal is of a type where the potential adverse effects are highly predictable and mitigable with known technology, (and providing any recommended mitigation measures); and
- Any matter of importance to the Party related to the project proposal including if a Review is required any additional factors that should be considered as part of that process.

The Northern Projects Management Office is responding on behalf of: Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC); Environment and Climate Change Canada (ECCC); Fisheries and Oceans Canada (DFO); Natural Resources Canada (NRCan); and, Transport Canada (TC). It is the position of the responding departments that the project proposal warrants an in-depth review by the Board. As requested, please find attached comments from the Government of Canada (Attachments 1-5).

Health Canada has also reviewed the project proposal and has no comments at this time.



The Government of Canada would like to thank the Board for the opportunity to provide comments on the project proposal. Federal departments look forward to participating in further assessment stages for the project proposal, as applicable.

Sincerely,

Melissa Alexander
Senior Project Manager
Northern Projects Management Office

Cc Shari Currie, Regional Director, Prairie and Northern Region, Transport Canada

Thomas Hoggarth, Regional Director of Aquatic Ecosystems, Arctic Region, Fisheries and Oceans Canada

Jody Small, Regional Director Prairie and Northern Region, Environmental Protection Operations Directorate

Hieu Vu, Director General, Explosives, Regulatory and Business Services Branch, Lands and Minerals Sector, Natural Resources Canada

Spencer Dewar, A/ Regional Director General, Nunavut Region, Crown-Indigenous Relations and Northern Affairs Canada

Chantal Roberge, National Director, Environmental Health Programs, Health Canada



CIRNAC Comments to NIRB

Re: Notice of Screening for West Kitikmeot Resources Corporation's "Grays Bay Road and Port" Project Proposal



GCDPCS # 130106561



Canada

Nunavut Regional Office
918 Sivumugiaq Street
Iqaluit, NU, X0A 3H0

Your file - Votre référence
24XN038
Our file - Notre référence
GCdocs# 130106561

October 30, 2024

Re: Notice of Screening and Comment Request for West Kitikmeot Resources Corporation's "Grays Bay Road and Port" Project Proposal

On September 24, 2024, the Nunavut Impact Review Board (NIRB) invited parties to comment on West Kitikmeot Resources Corporation's "Grays Bay Road and Port" project proposal. Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) offers the responses below as it pertains to the NIRB's request:

Whether the project proposal is likely to arouse significant public concern; and if so, why.

CIRNAC 1: Project Scope and Public Engagement

CIRNAC notes that, due to the nature, scale and breadth of proposed project activities and components, the project proposal has the potential to arouse significant public concern. The proposed project may cause significant adverse eco-systemic and socio-economic effects (moreover, those effects may not be highly predictable in the local context). The magnitude of concern would be clarified through further opportunities for the public to provide comments on the proposed project. Community information sessions conducted by the NIRB and continued engagement by the Proponent are appropriate measures to assess the concern related to this project.

Issues that should be considered as part of any consultation activities should include:

- Incorporation of Inuit knowledge and Inuit Qaujimajatuqangit into project activities;
- Mitigation measures designed to reduce disturbances to wildlife and the environment;
- The experience of community members who participate in traditional and non-traditional activities within or in close proximity to the project area;
- Training and employment opportunities for Kitikmeot community members;
- Procurement opportunities for local and Inuit-owned firms; and
- Regular updates on the status of project activities.

Whether the project proposal is likely to cause significant adverse eco-systemic or socio-economic effects; and if so, why.

Whether the project proposal is likely to cause significant adverse impacts on wildlife habitat or Inuit harvest activities; and if so, why.



CIRNAC 2: Eco-systemic and Socio-Economic Effects

CIRNAC is of the view that the project has the potential to cause significant adverse eco-systemic or socio-economic effects, and significant adverse impacts on wildlife habitat or Inuit harvest activities.

Therefore, the potential adverse effects of the Grays Bay Road and Port project would be most appropriately assessed through a full environmental review. CIRNAC conducted a preliminary assessment of the Grays Bay Road and Port project proposal and identified the following components of the project that have the potential to cause significant effects and merit more in-depth assessment:

- The anticipated impacts of construction and operation activities on, water quality and quantity, vegetation, landforms and permafrost features in the area;
- The anticipated socio-economic impacts throughout the project's life cycle (i.e., Construction, Operations, Potential Temporary Closure/ Care and Maintenance, and Closure);
- The potential adverse impacts on the surrounding environment of the proposed development activities, including but not limited to the Grays Bay Port (Wharf), the Grays Bay Road Northern and Southern Termini, and the facilities required to support operations;
- Consideration for potential impacts to the groundwater regime and provisions for management and potential contamination of groundwater;
- The impacts of potential accidents or malfunctions during construction and operation;
- The potential for ongoing and incremental land use activities associated with this development and other mining and transportation activity in the Kitikmeot region to result in cumulative eco-systemic and socio-economic impacts;
- Consideration for potential transboundary impacts, given the proximity to the Northwest Territories border and the proposed connection to the Tibbitt to Contwoyto winter road;
- The adequacy of proposed mitigation, monitoring, and adaptive management measures.

Whether the project proposal is of a type where the potential adverse effects are highly predictable and mitigable with known technology, (and providing any recommended mitigation measures).

CIRNAC 3: Potential Adverse Effects and Mitigation Measures

IRNAC is of the view that a project of this scale operating in the North is not the type where potential adverse effects are highly predictable; there is a lack of comparable projects in Nunavut that have undergone Impact Assessments. Recommended mitigation measures could be provided following a more in-depth review in the areas of CIRNAC's jurisdictional responsibility. This responsibility in relation to the proposed project includes Ministerial responsibilities for approval of the water licence and administration of Crown land. Furthermore, CIRNAC appreciates being of assistance to the NIRB throughout the impact assessment process and expects to offer expertise in the following areas:



- Environmental impact assessment methodology
- Land contamination
- Surface water quality and quantity
- Groundwater quality and quantity
- Permafrost
- Waste management
- Vegetation
- Hazardous waste materials management
- Water and wastewater management and treatment
- Quarry design and construction
- Environmental monitoring and management plans
- Cumulative effects and alternatives assessment
- Geotechnical engineering
- Geochemistry (potential for acid rock drainage/metal leaching)
- Reclamation planning
- Socio-economic Impact Assessment

Any matter of importance to the Party related to the project proposal including if a Review is required and any additional factors that should be considered as part of that process.

CIRNAC 4: Potential for Positive Effects to Inuit through Employment, Training, and Procurement Opportunities

CIRNAC recommends that the Proponent prioritize the employment, training, and contracting of Inuit and Inuit firms located in Kitikmeot communities. Such efforts will allow for positive effects to be realized by community members and the local Inuit population. As a result, Inuit and Inuit-owned businesses of the five impacted Kitikmeot communities, including Kugluktuk, Cambridge Bay, Kugaaruk, Taloyoak, and Gjoa Haven, should be supported in ways that promote their inclusion in the project's development through employment, training, and procurement opportunities that may be made available.

CIRNAC appreciates the opportunity to provide comments and looks forward to working with the NIRB and the Proponent throughout any further phases related to this project. Should you have any questions, please contact Courtney White or David Abernethy by e-mail at courtney.white@rcaanc-cirnac.gc.ca or david.abernethy@rcaanc-cirnac.ca.

Sincerely,



Courtney White
A/Manager, Impact Assessment





Fisheries and Oceans
Canada

Pêches et Océans
Canada

Fish and Fish Habitat Protection Program
Arctic Region
301 – 5204 50th Ave. (Franklin)
Yellowknife, Northwest Territories
X1A 1E2

Programme de protection du poisson et de son habitat
Région de l'Arctique
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Yellowknife, Territoires du Nord-Ouest
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October 8, 2024

Your file *Votre référence*
24XN038

Our file *Notre référence*
24-HCAA-02338

Nunavut Impact Review Board
P.O. Box 1360 (29 Mitik St.)
Cambridge Bay, NU
X0B 0C0

Subject: West Kitikmeot Resources Corp.'s (WKRC) Grays Bay Road and Port Project Proposal

To whom it may concern,

On September 24, 2024, the Nunavut Impact Review Board (NIRB) invited parties to comment on the West Kitikmeot Resources Corp.'s (WKRC) "Grays Bay Road and Port" project proposal (NIRB file number: 24XN038). The Department of Fisheries and Oceans Canada (DFO) has reviewed the information submitted to NIRB and considered the potential environmental effects of the proposed project based on its mandate, i.e. the management, protection and conservation of fish and their habitats pursuant to the *Fisheries Act* and the *Species at-Risk Act*.

DFO is of the opinion that the proposed project warrants an in-depth analysis in relation to our mandate, specifically its potential impacts on fish and fish habitat. This is due to the inclusion in the project proposal of the construction and operation of structures near or in fish habitat (e.g., a deep-water port, a small craft harbour, a 230-km all-season access road, bridges and culverts). DFO's technical expertise pertaining to the *Fisheries Act* and the *Species at-Risk Act* will support the NIRB's assessment of this project's potential effects on the receiving environmental and on the valued ecosystem components.

If more information is required, please contact Natalie Grishaber at Natalie.Grishaber@dfo-mpo.gc.ca.

Yours sincerely,

Anna-Maija LaFlamme
A/ Senior Biologist
Fish and Fish Habitat Protection Program
Arctic Region Fisheries and Oceans Canada

Cc: Tatiana Leclerc-Beaulieu, DFO

Canada

Environmental Protection Operations Directorate

Prairie & Northern Region
5019 52nd Street, 4th Floor
P.O. Box 2310
Yellowknife, NT X1A 2P7

ECCC File: 6300 000 039/002
NIRB File: 24XN038



October 28, 2024

via email at: info@nirb.ca

Dionne Filiatrault
Executive Director
Nunavut Impact Review Board
29 Mitik Street
P.O. Box 1360
Cambridge Bay, NU X0B 0C0

Dear Dionne Filiatrault:

RE: 24XN038– West Kitikmeot Resources Corp – Grays Bay Road and Port – Preliminary Screening

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Impact Review Board (NIRB) regarding the above-mentioned screening.

ECCC provides expert information and knowledge to project assessments on subjects within the department's mandate, including climate change, air quality, water quality, biodiversity, environmental preparedness and emergencies. This work includes reviewing proponent characterization of environmental effects and proposed mitigation measures. We provide advice to decision-makers regarding a proponent's characterization of environmental effects, the efficacy of their proposed mitigation activities, and may suggest additional mitigation measures. Any comments received from ECCC in this context does not relieve the proponent of its obligations to respect all applicable federal legislation.

ECCC recommends a board review of this project to better understand the impacts it will have on water quality, air quality and species at risk within the project area.

ECCC has identified the following items which fall within its mandate and areas of expertise that we feel require further technical review to assess whether the Project will cause significant adverse eco-systemic impacts. A Board Review of the Project would ensure that the following topics and the supporting material provided could be adequately reviewed.



1. Freshwater Environment

Comment

ECCC has identified the following items that may potentially negatively effect the freshwater environment:

- leaks and spills of fuel and other contaminants may impact water quality of fish bearing waterbodies.
- wastewater, sewage and solid waste, including spills, releases, runoff and leachate may impact water quality of fish bearing waterbodies.
- runoff and leaching of nitrogen-based explosives and residues resulting from spills, may impact water quality of fish bearing waterbodies (nutrient-related issues).
- water withdrawal from lakes and other fish bearing waterbodies may result in impacts (i.e., reduced dissolved oxygen levels) and fish mortality.

ECCC Recommendations

ECCC recommends that the Proponent develop:

- a spill prevention, planning, and response measures and plans.
- an effective waste management procedures and plans.
- measures to minimize explosive residues and avoid spills, runoff, and leaching of explosives and their residues.
- mitigation measures and associated monitoring to avoid adverse effects on dissolved oxygen levels and aquatic life.

2. Marine Environment

Comment

ECCC has identified the following items that have the potential to negatively effect the marine environment:

- the port construction and operations activities, including but not limited to dredging have the potential to negatively impact marine water quality.
- spills of contaminants or hazardous materials.
- wastewater and sewage.

ECCC Recommendations

ECCC recommends that the Proponent develop:

- sediment and erosion control mitigation measures for the construction and operation of the port, and associated monitoring, to mitigate potential negative impacts on marine water quality.
- spill prevention, planning, and response measures and plans.
- effective management procedures and plans for wastewater and sewage. Effluent monitoring measures should be developed to assess discharge water quality to mitigate

potential negative impacts on marine water quality from discharges/releases and spills of wastewater and sewage.

3. Groundwater

Comment

According to Section 8.7 of the Project Proposal document, there is potential for effects (changes) to groundwater quality and a list of potential negative impacts were provided. ECCC notes that impacts to groundwater quality may have impacts to surface water quality in areas where groundwater daylights to surface waters.

ECCC has also identified the following items that have the potential to negatively effect the groundwater along the proposed route:

- construction activities have the potential to affect shallow groundwater.
- spills, runoff and leaching of nitrogen-based explosives and residues negatively impacting groundwater quality (nutrient-related issues).

ECCC Recommendations

ECCC recommends that the Proponent develop:

- measures to minimize adverse effects on groundwater quality from construction activities.
- measures to minimize explosive residues and avoid spills, runoff, and leaching of explosives and their residues.

4. Sediment Quality and Sediment Control

Comment

According to Sections 8.9, 8.10, 8.11 and 8.12 of the Project Proposal documents, the project could potentially affect sediment quality in the freshwater and marine environments. Effect pathways include sedimentation during construction and operations from instream works at watercourse crossings, dredging, and other activities. Discharges, site runoff, vessel operations, port maintenance activities, and other effect pathways were also identified.

Changes to sediment quality could potentially lead to adverse effects on water quality. Many substances can form associations with particulate matter and, if introduced into the aquatic environment, could become incorporated into aquatic sediments. Sediments can act as both sinks and subsequently sources of substances that have entered the aquatic environment. When substances are released from sediments, there is potential for associated changes to water quality.

ECCC notes potential negative impacts to the water quality of fish bearing waterbodies resulting from sedimentation and erosion during the construction of the all-season road and associated water crossing structures, including numerous bridges and culverts.

ECCC Recommendation(s)

ECCC recommends that the Proponent develop sediment and erosion control mitigation measures for the construction of the all-season road to mitigate potential negative impacts to the receiving fish bearing waterbodies. Measures should also be developed to contain suspended sediments during in-water works and monitor the effectiveness of containment.

5. Acid Rock Drainage

Comment

ECCC has identified the following items related to acid rock drainage from potentially acid generating rock along the proposed route:

- Potential negative impacts to groundwater quality resulting from release of contaminants from rock due to acid rock drainage or metal leaching.
- Potential negative impacts to the water quality of fish bearing waterbodies from quarrying and road construction resulting from release of contaminants from rock due to acid rock drainage or metal leaching (ARD/ML).

ECCC Recommendation(s)

ECCC recommends that the Proponent develop procedures to screen possible sources of ARD/ML (including rock cuts, quarries, stockpiles, embankments and armoring materials) for ARD/ML potential.

6. Species At Risk

Comment

ECCC has identified where additional information is required for the department to complete a technical review of the potential negative impacts on the ecosystem, and on the proposed measures to mitigate those impacts.

The following Species at Risk effects and mitigation measures are missing from the project proposal:

- Buff-breasted Sandpiper
- Eskimo Curlew
- Red Knot (islandica subspecies)
- Rusty Blackbird
- Transverse Lady Beetle

ECCC Recommendation(s)

ECCC recommends the proponent develops plans to mitigate impacts on species at risk and their habitat.

7. Migratory Birds

Comment

ECCC has identified where additional information is required for the department to complete a technical review of the potential negative impacts on wildlife and wildlife habitat, and on the proposed measures to mitigate those impacts.

The following potential impacts, effects and mitigation measures are missing from the project proposal:

- Predation pathways
- Filling in ponds or wetlands
- Brushing and laydowns in nesting areas
- Landscaping, grading, and piling soils
- Sea duck colonies' exposure to increased shipping.

The shipping routes have not been adequately considered as part of the application proposal study area. Shipping routes have not been directly proposed and have the potential to fall within Key Habitat Sites (KHS) at Lambert Channel and Bathurst and Elu Inlets. These sites are protected, and both are classified as highly risk intolerant terrestrial and marine KHS with nesting island sea ducks.

ECCC Recommendation(s)

ECCC recommends the proponent develop plans to mitigate impacts and manage risks to migratory birds and their habits. Should the project proceed to a Board Review, more information regarding shipping traffic, shipping routes, and shipping schedules would help reviewers assess the risks and mitigation adequacy of avoiding protected key habitat areas.

8. Species At Risk and Migratory Birds

Comment

Impacts and mitigations should be comparable to other all-weather road and port projects in Nunavut and the Northwest Territories.

Timing of construction and blasting activities is the most highly recommended strategy to mitigate and reduce impacts to birds and species at risk.

ECCC Recommendation(s)

ECCC recommends that the timing of construction and blasting activities should be planned to avoid disturbance to species at risk and during nesting periods, which in this area are from mid-May to mid-August in nesting zone N9 and late May to mid-August in nesting zone N10.

9. Construction Vehicle Emissions Standards

Comment

Section 8.1.3 mentions the intent to reduce atmospheric emissions where practical. This is a large-scale project with associated air emissions. The need to source construction equipment externally provides an opportunity to seek equipment containing engines meeting Tier 4 emission standards which would provide for considerable reductions in air emissions.

ECCC Recommendation(s)

ECCC requests a commitment to source construction equipment with engines that meet Tier 4 emission standards where practical.

10. Storage of Clean Fuels for Marine Shipping

Comment

Section 2.1.1.3 provides a description of port facilities including fuel storage systems. Previous studies pre-date the establishment of the Canadian Arctic Emission Control Area (ECA), which comes into effect in March 1, 2026, and is intended to improve air quality. The ECA requirements entail the use of fuels with sulfur levels of no more than 0.10% mass/mass.

ECCC Recommendation(s)

ECCC recommends that the proponent familiarize themselves with the new requirements and compliance measures, including marine shipping fuels, under the Canadian Arctic ECA. The new emissions control areas can be accessed at <https://www.highnorthnews.com/en/canadian-arctic-and-norwegian-sea-new-emission-control-areas>

ECCC notes that potential negative effects may be similar to those of other comparable projects and as such are expected to be predictable and mitigatable with known technology. However, project design, mitigation measures, monitoring and adaptive management will be key to limiting the intensity, duration and scale of potential negative impacts.

If you need more information, please contact Russell Wykes at (867) 446-1263 or Russell.Wykes@ec.gc.ca

Sincerely,



Leslie Yasul
A/ Environmental Assessment Manager, PNR

cc: Eva Walker, Head, EA North (NT and NU)
Russell Wykes, Senior Environmental Assessment Officer, EA North



NIRB file: 24XN038

NRCan file: NT-089

October 10, 2024

Nunavut Impact Review Board
P.O. Box 1360 (29 Mitik St.)
Cambridge Bay, NU
X0B 0C0

Subject: West Kitikmeot Resources Corp.'s Grays Bay Road and Port – Nunavut Impact Review Board's Request for Comments (Notice of Screening)

Natural Resources Canada (NRCan) received the Nunavut Impact Review Board (NIRB) letter dated September 24, 2024, which requested parties to review and provide comments on West Kitikmeot Resources Corp.'s Grays Bay Road and Port Project Proposal (the Project).

Specifically, the NIRB requested comments on:

- 1. Whether the project proposal is likely to cause significant adverse eco-systemic or socio-economic effects; and if so, why; and*
- 2. Whether the project proposal is likely to cause significant adverse impacts on wildlife habitat or Inuit harvest activities; and if so, why.*

NRCan notes that the Grays Bay Road and Port Project is a major road and port facility, similar to the one previously initiated (NIRB file: 17XN011). Limited information on potential environmental effects and baseline is provided in the proposal, and a more in-depth review of the Project is required in order to determine if there is the potential for significant adverse environmental effects.

Within the context of NRCan's mandate, the following technical expertise will be provided if the NIRB refers the project for a Review as per the *Nunavut Project Planning and Assessment Act*:

- marine geosciences;
- permafrost; and
- explosives storage and manufacture.

NRCan may revise its technical expertise depending on additional information that may be relevant to the Project activities and could be provided as the Project moves forward.

- 3. Whether the project proposal is of a type where the potential adverse effects are highly predictable and mitigable with known technology, (and providing any recommended mitigation measures).*

NRCan notes that with respect to explosives storage and manufacture, the *Explosives Act* and Regulations ensure the advancement of explosives safety and security technology. As a result, explosives storage and manufacture is not expected to cause adverse effects and any potential



Natural Resources
Canada

Ressources naturelles
Canada

effects are highly predictable and mitigable with known technology as per the *Explosives Act* and Regulations.

4. *Any matter of importance to the Party related to the project proposal including if a Review is required any additional factors that should be considered as part of that process.*

NRCan is responsible for administering the *Explosives Act*, Regulations, and pursuing the advancement of explosives safety and security technology. Our principal priority is the safety and security of the public and of all workers involved in the explosives industry in Canada. Through the Explosives Regulatory Division, NRCan provides services and support to the explosives industry, including manufacturers, importers, distributors, and users of explosives.

The manufacturing of explosives requires a licence issued by NRCan under the *Explosives Act*. That licence could include the storage of explosives.

Should you have any questions or if you require clarification, please contact Clarisse Fiset (clarisse.fiset@nrcan-rncan.gc.ca).

Sincerely,

Original signed by

Clarisse Fiset
Impact Assessment Officer, Impact Assessment Division
Office of the Chief Scientist
Natural Resources Canada
Government of Canada

Cc: Pierre-Olivier Émond, Lands and Minerals Sector
Aruna Dixit, Lands and Minerals Sector
Peter Unger, Office of the Chief Scientist



Transport Transports
Canada Canada

P.O. Box 8550
3rd Floor, Programs – Environmental Programs
344 Edmonton Street
Winnipeg, Manitoba
R3C 0P6

Your file/Votre référence
NIRB file: 24XN038

TC file/Notre référence
7075-70-1-647

October 24, 2024

Nunavut Impact Review Board
P.O. Box 1360 (29 Mitik St.)
Cambridge Bay, NU X0B 0C0

RE: West Kitikmeot Resources Corp.'s Grays Bay Road and Port Project Proposal

To the Nunavut Impact Review Board:

Transport Canada is responding to the Nunavut Impact Review Board's (NIRB) request to parties to comment on the West Kitikmeot Resources Corp.'s (WKRC) "Grays Bay Road and Port" August 2024 project proposal (NIRB file number: 24XN038). Transport Canada has reviewed the project proposal and identified project components and activities that are subject to the Department's regulatory mandate. These include:

- Construction of over 200 water crossings, which include single or multi-span bridges and culverts.
- Construction and operations of a Grays Bay Port, which includes:
 - Development of wharves.
 - Dredging of sea floor.
 - Small craft harbour.
 - Mobilization of construction materials and equipment via two (2) ocean freighters and barges, lightering and delivering to the Grays Bay shore, followed by annual sealift deliveries during construction and operations.
 - Future vessel traffic to and from the port.
 - Establishment of fuel storage facilities to initially contain 10 million litres (ML) of fuel with the potential to expand to 160 ML of fuel.
- Construction of an 1,800 m airstrip, possibly to be expanded to 2,400 meters.
- Water withdrawals.
- Transportation of dangerous goods (hazardous materials).

Given Transport Canada's regulatory responsibilities for the project, the Minister of Transport is a 'responsible Minister' under the *Nunavut Planning and Project Assessment Act*.

Based on Transport Canada's experience with other large project proposals in Nunavut, it is the Department's opinion the proposed project is likely to be a cause of significant public concern. Therefore, Transport Canada is of the view the proposed project warrants an in-depth review by NIRB to identify these concerns and potential mitigation measures to address them.



Transport Canada Transports
Canada Canada

If you have any questions regarding this submission, please contact Scott Kidd
(Regional Environmental Advisor) at scott.kidd@tc.gc.ca.

Regards,

ZellisSkiba, Margaret
Digitally signed by ZellisSkiba, Margaret
DN: C=CA, O=GC, OU=TC-TC, CN=
ZellisSkiba, Margaret
Reason: I am approving this document
Location:
Date: 2024.10.23 08:07:42-0500
Foxit PDF Editor Version: 13.1.3

Margaret Zellis-Skiba

Acting Regional Manager, Environmental Programs, Prairie and Northern Region
Transport Canada, Prairie and Northern Region / Government of Canada